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January 18, 2022

Hon. John G. Koeltl United States District Court 500 Pearl Street Southern District of New York New York, NY 10007

Re:

United States v. Marcos Delacruz, 16-cr-262-03 (JGK)

Dear Judge Koeltl:

As the Court is aware, I am lead counsel for the defendant Marcos Delacruz in the above-referenced matter, assisted by my colleagues including Emily Tate. I am writing respectfully to request that Ms. Tate, who is intimately familiar with the relevant facts and legal issues, be permitted to take the lead in arguing on Mr. Delacruz's behalf at the January 18, 2022 sentencing.

I have worked closely with Ms. Tate in every aspect of Mr. Delacruz's defense. Ms. Tate is an excellent lawyer who has played an integral role in our representation of Mr. Delacruz, and developed an exhaustive knowledge of the record. I have consulted with Mr. Delacruz, who is comfortable with Ms. Tate taking the lead in the argument, and naturally I will be fully prepared to assist should the need arise.

Thank you for the Court's consideration of this request. We stand ready to supply any additional information the Court may require.

APPLICATION GRANTED SO ORDERED

John G. Koeltl, U.S.D.J.

Ani

/s/ Anirudh Bansal

Respectfully submitted,

Anirudh Bansal

cc:

AUSA Sagar Ravi (via ECF)